



## State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION  
SITE REMEDIATION AND WASTE MANAGEMENT PROGRAM  
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PHILLIP D. MURPHY  
*Governor*

SHEILA Y. OLIVER  
*Lt. Governor*

SHAWN M. LATOURETTI  
*Acting Commissioner*

Pat Evangelista, Director  
Superfund and Emergency Response Division  
U.S. Environmental Protection Agency Region II  
290 Broadway  
New York, NY 10007-1866

March 1, 2021

RE: Sherwin-Williams/Hilliards Creek Superfund Site, Waterbodies Unit  
Gibbsboro, Camden County, New Jersey  
PI No. G000004382, EA No. RPC000005

Dear Mr. Evangelista:

The New Jersey Department of Environmental Protection (Department) has reviewed the Proposed Plan for the Sherwin-Williams/Hilliards Creek Superfund Site, Operable Unit (OU) 4, also known as the "Waterbodies OU", prepared by the U.S. Environmental Protection Agency (EPA) Region II. This proposed plan addresses soil, sediments, and surface water in the "Waterbodies OU" which includes Silver Lake, Bridgewood Lake, Kirkwood Lake and portions of Hilliards Creek in Gibbsboro and Voorhees Twp., Camden County New Jersey.

The preferred alternative includes:

- Excavation and off-site disposal of contaminated sediment from Silver Lake, Bridgewood Lake, Kirkwood Lake and Hilliards Creek;
- post-remedy surface water monitoring to evaluate the effectiveness of the remedy;
- Restoration and revegetation of the Hilliards Creek floodplain, and lake shorelines as needed; post-remedy monitoring to ensure successful restoration;
- Excavation and off-site disposal of contaminated soil from the Hilliards Creek floodplain, removal to accommodate a cap where needed; backfill and restoration of excavation areas;
- Establishment of institutional controls as needed.

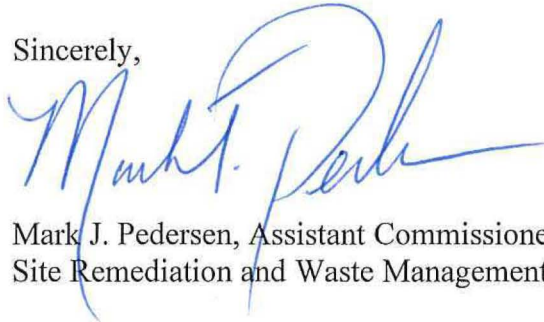
The Department acknowledges that this preferred alternative would remove the highest concentrations of arsenic and lead (and other contaminants) in shallow soils while preserving, to the extent possible, the high and medium quality wetland and forested areas that exist within the Hilliards Creek floodplain. This preferred alternative is designed to minimize damage to ecological habitat and provide the greatest potential for complete restoration of the functions and values of these habitats.

The Department acknowledges that residential properties (OU1) along Hilliards Creek and Kirkwood Lake were addressed by a September 2015 Record of Decision (ROD) and that sediment, soil and surface water in the upper portions of Hilliards Creek (OU2) were addressed by a June 2020 ROD; groundwater (OU3) and impacts to the Cooper River will be addressed at a later date.

The Department concurs with the selected remedy for sediment and surface water and the selected remedy for soil on those parcels that will not require a deed notice for the Waterbodies OU. However, because property owner consent to the implementation of a remedy that requires a cap and deed notice has not been obtained, the Department cannot concur with the Proposed Plan. If property owner consent is obtained, the Department will concur on the Proposed Plan.

Should you wish to discuss this matter further please feel free to contact me at (609) 292-1250.

Sincerely,



Mark J. Pedersen, Assistant Commissioner  
Site Remediation and Waste Management Program

CC: Lynn Vogel, NJDEP, BCM

